

CONTINUATION OF CRIMINAL COMPLAINT

I, Heather Williamson, being duly sworn, state as follows:

Introduction

1. This continuation of a criminal complaint is made to authorize the arrest of DANIELLE LENA-MARY JONES for possession with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C), on or about August 30, 2023, in Ionia County, in the Western District of Michigan. This continuation is made for the limited purpose of establishing probable cause and does not include each and every fact known by me.

2. I am a Special Agent of the Drug Enforcement Administration (“DEA”) and have been so employed since January 2013. I am currently assigned to the Grand Rapids District Office. Previously, I was assigned to the Southwest Border Initiative Group-3 (“SWB-3”) and to the Los Angeles Strike Force for approximately six years. The Los Angeles Strike Force is an investigative group jointly led by the DEA and the FBI, and composed of several other federal, state, and local agencies that is focused on the disruption of the Mexico-based Sinaloa Cartel. Prior to working as a DEA Special Agent, I completed 20 weeks of training at the DEA Academy in Quantico, Virginia, which included instruction in narcotics identification, detection, trafficking, and interdiction; money laundering techniques; asset identification, seizure, and forfeiture; and techniques used by narcotics traffickers to avoid detection by law enforcement officials. I have investigated drug trafficking organizations involved in violating various federal laws, including, but not limited to, unlawful

importation of controlled substances; the distribution of controlled substances; manufacturing of controlled substances; and possession with intent to distribute controlled substances, including cocaine, methamphetamine, heroin, and other dangerous drugs; as well as money laundering. I have participated in investigations of unlawful drug trafficking and money laundering and, among other things, have conducted or participated in surveillance; execution of search warrants; debriefings of informants; reviewing of taped conversations and drug records; and have participated in investigations that include the interception of wire communications.

3. Through my training, education, and experience, I have become familiar with the manner in which illegal drugs are transported, stored, and distributed, the methods of payment for such drugs, the laundering of narcotics proceeds, and the dialect (lingo) and coded language used by narcotics traffickers. In connection with my duties, I investigate criminal violations of the federal and state controlled substance laws, including, but not limited to, conspiracy and attempt to possess with intent to distribute and to distribute controlled substances, in violation of Title 21, United States Code, Section 846; possession with intent to distribute and distribution of controlled substances, in violation of Title 21, United States Code, Section 841(a)(1); use of communication facilities to facilitate drug trafficking offenses, in violation of Title 21, United States Code, Section 843(b); and offenses involving money laundering as well as conspiracy and attempt to do the same, in violation of Title 18, United States Code, Sections 1956 and 1957. Many of these investigations also

involve firearms offenses, including violations of Title 18, United States Code, Sections 922 and 924.

4. The information in this criminal complaint is based on my personal knowledge gained from my participation in this investigation, and information received from other law enforcement officers who have been involved in this investigation.

5. I respectfully submit that the facts set forth in this criminal complaint establish probable cause to believe that on or about August 30, 2023, in Ionia County, in the Southern Division of the Western District of Michigan, JONES knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C).

Probable Cause

6. Since at least early 2023, the DEA, the Michigan State Police (“MSP”), and the MSP-sponsored Southwest Enforcement Team (“SWET”) and Central Michigan Enforcement Team (“CMET”) have been investigating MICHAEL THOMAS, a/k/a “Money,” and his associates, known and unknown, for drug trafficking crimes in the Western District of Michigan, including Kent County and Ionia County.

7. THOMAS is 37 years old, and his criminal history includes state convictions for misdemeanor traffic violations, possession of marijuana, domestic violence, and felony convictions for delivery/manufacture controlled substance –

cocaine or heroin less than 50 grams, possession of a controlled substance – cocaine or heroin less than 25 grams, 3rd degree home invasion, possession of a firearm by a felon, resisting/obstructing/assault of a police officer, and possession of methamphetamine/ecstasy. THOMAS has pending felony drug and firearm charges in Kent County Circuit Court with a trial date of September 11, 2023.

8. DANIELLE LENA-MARY JONES is 32 years old and does not appear to have any prior criminal convictions. JONES is the half-sister of THOMAS.

9. On March 8, 2023, CMET and SWET detectives utilized a confidential informant¹ (CI) to purchase methamphetamine and heroin from THOMAS at 660 56th Street, Apartment #7, Grand Rapids, Michigan. CI bought approximately one ounce of methamphetamine and 4 grams of heroin from THOMAS.

10. On May 1, 2023, CMET and SWET detectives again utilized CI to purchase methamphetamine from THOMAS at 660 56th Street, Apartment #7, Grand Rapids, Michigan. This time, CI bought approximately 4 ounces of methamphetamine from THOMAS. When the CI arrived at the apartment, a black female was present and actually handed the methamphetamine to the CI. THOMAS was communicating with the CI over an electronic doorbell device. After the controlled purchase was complete, investigators saw a black Buick Lacrosse that belongs to THOMAS's girlfriend, VICENTA MICHEL (also known to investigators as "Nadia Michel" via

¹ Investigators believe CI is credible and reliable through controlled purchases of narcotics and information that has led to the arrest of larceny suspects.

Facebook), leave the apartment complex and go back to another address in Grand Rapids where investigators believe THOMAS stays part time.

11. Based on my training and experience, it is common for drug dealers to use middlemen, intermediaries, or couriers to make drug sales or drug pick-ups to avoid law enforcement detection. Based on my participation in this investigation, as shown in the May 1 controlled purchase, THOMAS uses other individuals, often women, to make drug sales or to pick up drugs for him to avoid law enforcement detection.

12. Throughout the investigation, during physical surveillance of THOMAS at 660 56th Street, Grand Rapids, Michigan, investigators have seen a blue 2020 Subaru Legacy, Michigan registration EGC6453, registered to THOMAS at that address (“the Subject Vehicle”).

13. On March 17, 2023, a state court search warrant was authorized for the installation of a GPS tracking device on the Subject Vehicle. The warrant was reauthorized on August 15, 2023.

14. In the afternoon of August 30, 2023, through state court-authorized GPS monitoring of the Subject Vehicle, investigators learned that the Subject Vehicle was traveling from the Grand Rapids area towards Detroit. Based on prior surveillance of THOMAS and the Subject Vehicle, and my training and experience and the training and experience of other law enforcement officers involved in the investigation, investigators believed that the Subject Vehicle was traveling to Detroit to acquire a new supply of controlled substances for further distribution.

15. At approximately 6:56 p.m., through both GPS monitoring of the Subject Vehicle and physical surveillance by law enforcement officers, investigators saw the Subject Vehicle stop at 15285 Young Street, Detroit, Michigan.

16. After the Subject Vehicle stopped, a female, later identified as JONES, exited the driver's seat of the Subject Vehicle and walked inside the residence at 15285 Young Street, Detroit, Michigan.

17. Minutes later, investigators saw JONES leave the residence and get back into the Subject Vehicle and drive away. The Subject Vehicle was stopped at the residence for no more than three minutes.

18. Immediately after leaving the residence, the Subject Vehicle started "cleaning," a technique that is designed to evade law enforcement detection and surveillance.

19. Eventually, the Subject Vehicle got on the interstate and started traveling west away from Detroit back towards the Western District of Michigan. Investigators continued surveillance of the Subject Vehicle as it passed Lansing and entered Ionia County on westbound Interstate 96, within the Western District of Michigan.

20. Around mile marker 64 on westbound Interstate 96, at approximately 8:59 p.m., a marked MSP unit performed a traffic stop on the Subject Vehicle for no insurance, improper window tint, and an obstruction on the rearview mirror.

21. The MSP Trooper made contact with JONES, the driver and sole occupant of the Subject Vehicle, and advised JONES of the reason for the traffic stop. It was readily apparent to the MSP Trooper that JONES was extremely nervous.

22. JONES told the Trooper that it was her brother's vehicle. JONES was not able to produce valid insurance for the Subject Vehicle.

23. When asked where she was coming from, JONES stated that she was visiting her boyfriend all day in Detroit, but she declined to provide her boyfriend's address. JONES said she is from Grand Rapids and left for Detroit earlier in the morning after dropping her daughter off at school around 7:20 a.m. When asked what she did with her boyfriend in Detroit, JONES said they just hung out at the house, and said she would have stayed longer but she had to work tomorrow. JONES stated she works for Allegiant Airlines.

24. JONES declined to give consent for the MSP Trooper to search the Subject Vehicle. The MSP Trooper informed JONES that a K-9 Trooper trained to detect controlled substances was going to perform a free-air sniff for the odor of narcotics around the exterior of the Subject Vehicle.

25. While running the K-9 Trooper around the exterior of the Subject Vehicle, the K-9 Trooper gave a positive indication for the odor of narcotics near the rear passenger door of the Subject Vehicle.

26. The MSP Trooper subsequently searched the Subject Vehicle and found a backpack on the floorboard of the rear passenger seat, right where the K-9 Trooper gave a positive alert. Inside the backpack, the MSP Trooper found five individually

wrapped bundles of a substance that later field tested positive for methamphetamine, a Schedule II controlled substance, and weighed approximately 11 pounds in total with packaging. Approximately \$1,400 U.S. currency was seized from JONES' wallet.







27. JONES denied knowledge of the backpack or its contents and declined to answer questions from law enforcement.

28. While still on the shoulder of westbound Interstate 96, in the middle of the traffic stop, VICENTA MICHEL arrived on scene and told investigators that a friend had texted her and told her that JONES was pulled over near Ionia and needed help. Based on surveillance and social media posts, investigators believe that MICHEL is a girlfriend of THOMAS.

29. Based on my training and experience, 11 pounds of methamphetamine is a distribution quantity that was intended to be broken down for further distribution.

30. JONES was arrested on state charges for driving without insurance and possession with the intent to distribute methamphetamine and lodged at the Ionia County Jail.

Conclusion

31. Based on the above information, there is probable cause to believe that on or about August 30, 2023, in Ionia County, in the Western District of Michigan, JONES knowingly and intentionally possessed with intent to distribute a mixture and substance containing a detectable amount of methamphetamine, a Schedule II controlled substance, in violation of 21 U.S.C. §§ 841(a)(1), 841(b)(1)(C).